

REMARKS/ARGUMENTS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action. Favorable reconsideration of the application is requested in view of the remarks and amendments made herein.

Claims 1-6 and 9-13 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe et al. (US 5,625,526) in view of Barnes et al. (US 5,670,066), Ito et al. (US 6,815,646), Zhao et al. (US 5,589,003), and Mulligan et al. (US 6,164,633). Traversal of this rejection is made for at least the following reasons. The Examiner relies on Barnes as teaching the claimed first and second insulating areas, each of which surround first and second metal areas, respectively – the metal being the material used for the electrode member. Claims 1 and 9 further requires that the insulating areas are sized such that outer edges of corresponding small and large wafers are positioned within the inner and outer boundaries of each of the respective insulating areas. The Examiner concedes that Watanabe does not teach these limitations; however the Examiner does not specifically point out which reference is being used to teach or suggest these limitations. In Barnes, the only reference used by the Examiner to show insulating areas, there is nothing that discloses, teaches, or suggests configuring the insulating areas so that an outer edge of a corresponding wafer lies within the boundaries of the respective insulating areas. Instead, the insulating areas of Barnes are only provided to so that the electrodes 34 and 38 of chuck 30 can be at different electric potentials relative to each other and the housing. See Col. 3, lines 58-61 of Barnes. In fact, as can be seen in Figure 1 of Barnes, the workpiece 32 is positioned on the chuck 30 such that the outer edges of the workpiece 32 are located within the inner and outer boundaries of ring electrode 38. This is done so that proper positioning of the workpiece can be accomplished by measuring the capacitance between electrodes 34 and 38 prior to and subsequent to the workpiece 32 being placed on the chuck. See Col. 4, lines 32-36. For at least this reason, one skilled in the art would never have been motivated by Barnes to configure an electrode member such that first and second insulating areas 40 are configured to receive the outer edges of small and large wafers, respectively, as required by the present claims.

While Mulligan discloses a mounting surface constructed to accommodate at least two

different sized wafers, there is nothing that would have motivated a skilled person to apply both insulating coating of Barnes and the teachings of Mulligan to arrive at the claimed invention. One would have only been motivated to use the insulating coatings of Barnes to employ two or more electrodes having different electric potentials for determining proper positioning of a workpiece. In contrast, Mulligan discloses the use of annular shoulders 32, 34, 28 for proper positioning of different sized wafers on the chuck. It appears that the Examiner contends that one would have used Mulligan as motivated to use one chuck with different sized wafers and used Barnes to apply the insulating coating on the face of the chuck or electrode. Yet, even if one combined the teachings of both Barnes and Mulligan in this manner, the result still would not have met the limitations of the present claims. This combination could have only resulted in a chuck having a first metal block electrode and second and third metal ring electrodes, each of the first, second and third electrodes having different electrical potentials so that the capacitance between the electrodes can be measured to determine proper positioning of the workpiece. In this configuration, the insulating coatings would have been provided between each of the different electrodes. However, these coatings would not have been configured such that outer edges of the different sized workpieces, or wafers, would have been positioned within the boundaries of the insulating coatings, as required by the present claims. Instead, the ring electrodes would have been configured to receive the outer edges of the different sized workpieces, as taught by Barnes.

In view of the above, Watanabe, Barnes, Ito, Zhao, and Mulligan fail to teach or suggest placing at least two insulating films on a face of an electrode are areas designated by outer diameters of two different sized wafers, as required by claims 1 and 9. Withdrawal of this rejection is respectfully requested.

Claims 7 and 8 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe et al. (US 5,625,526) in view of Barnes et al. (US 5,670,066), Ito et al. (US 6,815,646), Zhao et al. (US 5,589,003), and Mulligan et al. (US 6,164,633) as applied to claims 1-6 and 9-13 above, and further in view of Garabedian et al. (US 2002/0179246) and Sago et al. (US 2003-0198005). Traversal of this rejection is made for at least the following reasons. Claims 7 and 8 depend from claim 1, which is believed to be allowable over the combination of Watanabe,

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Barnes, Ito, Zhao, and Mulligan for the reasons discussed above. Neither Garabedian nor Sago, alone or in combination, make up for the deficiencies of Watanabe, Barnes, Ito, Zhao, and Mulligan, as neither Garabedian nor Sago disclose placing at least two insulating films on a face of an electrode are areas designated by outer diameters of two different sized wafers. Accordingly the combination of Watanabe, Barnes, Ito, Zhao, Mulligan, Garabedian and Sago do not render claims 7 and 8 obvious. Withdrawal of this rejection is respectfully requested.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. NGB-39102.

Respectfully submitted,
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